

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)**

JAMES HERBERT BOYD, JR., *et al.*,

Plaintiffs,

v.

Case No. 8:15-cv-03068-PJM

SFS COMMUNICATIONS, LLC, *et al.*,

Defendants.

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs James Boyd, Jr., John Poles, Steven Borden, and Courtney Wilson, by and through undersigned counsel, pursuant to Federal Rule of Civil Procedure 23, hereby move for class certification of a class consisting of all individuals employed directly by SFS Defendants from September 24, 2012 until July 1, 2018 who performed cable installation work in Maryland for CUI Defendants. As grounds for this motion, Plaintiffs submit the accompanying memorandum of law in support thereof and exhibits thereto.

WHEREFORE, Plaintiffs request that their Motion for Class Certification be granted. Specifically, Plaintiffs request that the Court certify a class of all individuals employed directly by SFS Defendants from September 24, 2012 until July 1, 2018 who performed cable installation work in Maryland for CUI Defendants; authorize notice of the certification to the class by mail and email pursuant to Rule 23(c)(2)(B); approve the form of the notice attached as Exhibit 21 to Plaintiffs' memorandum of law in support of the Motion; and order CUI Defendants to produce a list in Excel or other electronic manipulable format containing the names, employee or technician identification numbers, last known addresses, phone numbers, emails, and the last

four digits of their social security numbers for all class members within 10 days of the ruling granting class certification for the limited purpose of sending notice to class members.

Date: March 29, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2019 a copy of the foregoing was served via ECF to counsel of record.

/s/ Sam J. Smith

Sam J. Smith